

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

A.C., a minor child, by his next friend,)	
mother and legal guardian, M.C.,)	
)	
Plaintiff,)	
)	
v.)	No. 1:21-cv-2965-TWP-MPB
)	
METROPOLITAN SCHOOL DISTRICT OF)	
MARTINSVILLE;)	
PRINCIPAL, JOHN R. WOODEN MIDDLE)	
SCHOOL, in his official capacity,)	
)	
Defendants.)	

Motion for Mother, Legal Guardian, and Next Friend to Proceed by Pseudonym

M.C., who is the mother of the plaintiff A.C. in this case and who is representing him as his mother, next friend, and legal guardian, files this motion pursuant to Local Rule 10-1 and requests that she be allowed to proceed in this action by her initials as a pseudonym. In support of this motion, she says that:

1. The plaintiff-child in this action is automatically proceeding by his initials pursuant to Federal Rule of Civil Procedure 5.2(a)(3).
2. To protect the privacy and safety of her minor child, who is a transgender male challenging the denial of his right to use male restrooms in his middle school and the failure of the school system to otherwise recognize him as male, she desires to proceed

anonymously as the identity of her child could easily be determined if her actual name was publicly disclosed.

3. In further support of this motion she attaches her declaration and separately files her memorandum of law, both of which are incorporated by reference and set forth her justification for proceeding anonymously.

WHEREFORE, plaintiff's mother, legal guardian, and next friend requests that she be allowed to proceed under the pseudonym of M.C., and for all other proper relief.

Kenneth J. Falk
Stevie J. Pactor
ACLU of Indiana
1031 E. Washington St.
Indianapolis, IN 46202
317/635-4059
fax: 317/635-4105
kfalk@aclu-in.org
spactor@aclu-in.org

Attorneys for Plaintiff

Certificate of Service

I certify that on this 3rd day of December 2021, a copy of the foregoing was filed electronically with the Clerk of this Court and was served on the below-named parties by first class U.S. Postage, pre-paid.

Metropolitan School District of Martinsville
Central Education Center
389 E. Jackson St.
Martinsville, IN 46151

Principal
John R. Wooden Middle School
109 E. Garfield St.
Martinsville, IN 46151

Kenneth J. Falk
Attorney at Law